

SEP 15 2011

Clerk of Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

CESAR AVILA
CARLOS MARTINEZ-AGUILAR

§
§
§
§
§

CRIMINAL NUMBER:

H 11 - 655

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

From on or about July 25, 2011 through August 18, 2011, in the Southern District of Texas and elsewhere, the defendants,

CESAR AVILA
and
CARLOS MARTINEZ-AGUILAR,

did combine, conspire, confederate and agree with each other and with others both known and unknown to the grand jury, to seize and detain and threaten to continue to detain in the United States and elsewhere, certain foreign nationals, namely, Arnando Misael Medina-Moradel, Alejandro Hernandez-Hernandez, Norma Seapa Dominguez, Juana Anacleta Gomez-Pascual and Maria Concepcion Claros, in order to compel others to do an act, that is, to pay a sum of money as an explicit and implicit condition for the release of the foreign nationals.

In violation of Title 18, United States Code, Section 1203(a).

COUNTS TWO, THREE, FOUR and FIVE

From on or about July 25, 2011 through August 18, 2011, in the Southern District of Texas and elsewhere, the defendants,

**CESAR AVILA,
and
CARLOS MARTINEZ-AGUILAR,**

did seize and detain and threaten to continue to detain in the United States and elsewhere, certain foreign nationals as listed in Counts Two through Five below, in order to compel others to do an act, that is, to pay a sum of money as an explicit and implicit condition for the release of the foreign nationals.

Count:	Alien Name:
Two	Arnando Misael Medina Morael
Three	Alejandro Hernandez-Hernandez
Four	Norma Seapa Dominguez
Five	Maria Concepcion Claros

In violation of Title 18, United States Code, Section 1203(a).

COUNT SIX

On or about August 18, 2011, in the Southern District of Texas, the defendant,

CESAR AVILA,

did use a firearm that is, a pistol, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, hostage taking.

In violation of title 18 United States Code, Section 924(c)(1)(A).

COUNTS SEVEN, EIGHT, NINE, and TEN

From on or about July 25, 2011 through August 18, 2011, in the Southern District of Texas and elsewhere, the defendants,

**CESAR AVILA
and
CARLOS MARTINEZ-AGUILAR,**

knowing and in reckless disregard of the fact that certain aliens had come to, entered and remained in the United States in violation of law, conceals, harbors, and shields from detection such aliens within the United States in any place, including any building and any means of transportation, for the purpose of commercial advantage and private financial gain, as set forth in Counts Seven, Eight, Nine and Ten below:

<u>Count</u>	<u>Alien Name</u>
7	Armando Misael Medina-Moradel
8	Alejandro Hernandez-Hernandez
9	Norma Seapa Dominguez
10	Maria Concepcion Claros

In violation of Title 8, United States Code, Section 1324 (a)(I)(A)(iii).

A TRUE BILL

Original Signature on File

FOREPERSON

JOSE ANGEL MORENO
United States Attorney

By:

Douglas Davis
DOUGLAS DAVIS
Assistant United States Attorney